UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

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JANE DOE,)
Plaintiff,)
v.) Case No. 1:18-cv-614 (MSN/IDD)
FAIRFAX COUNTY SCHOOL BOARD,)
Defendant.)) _)

DEFENDANT FAIRFAX COUNTY SCHOOL BOARD'S PROPOSED WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendant Fairfax County School Board provides the following about the witnesses that it may present at trial other than solely for impeachment:

A. Witnesses Whom the School Board Expects to Call

- 1. Michelle Taylor
- 2. Jennifer Hogan
- 3. John Banbury
- 4. Jamie VanValkenburg
- 5. Alyson Calvello
- 6. Walter Baranyk
- 7. Jane Doe
- 8. Michael Campfield
- 9. Belinda Dahlman
- 10. Mary Brady
- 11. Charles Grausz

- 12. Mohammed Nouristani
- 13. Marisa London
- 14. Donald Clark
- 15. Mary Ann Panarelli
- 16. Laura Kelly
- 17. Jamie Lane
- 18. Jack Smith

B. Witnesses Whom the School Board May Call if the Need Arises

- 19. Liza H. Gold, M.D.
- 20. Any witness identified in Plaintiff's Rule 26(a)(3)(A) disclosures to whom Defendant does not object or to whom Defendant's objection is overruled.

C. <u>Designation of Those Witnesses Whose Testimony the School Board Expects to</u> Present by Deposition

The School Board does not currently expect to present any witnesses by deposition, but it reserves the right to present witnesses through deposition should any witness become unavailable to testify in person at trial.

Respectfully submitted,

FAIRFAX COUNTY SCHOOL BOARD

By: /s/
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Counsel for Defendant Fairfax County School Board

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record for all Parties.

Sona Rewari (VSB No. 47327)